



Pacific Flyway Council

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Washington • Wyoming

July 2, 2004

Mr. Henri Bisson
State Director
Department of the Interior
Bureau of Land Management
222 W. 7th Avenue
Anchorage, AK 99513.

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Dear Mr. Bisson:

1 The Pacific Flyway Council wishes to express its concerns regarding your agency's proposal to amend the 1998 Integrated Activity Plan/Environmental Impact Statement for the 4.6 million-acre Northeast Planning Area of the National Petroleum Reserve-Alaska (NPR-A): "... (1) to evaluate exploration and development opportunities that could provide access to significant new oil discoveries, while remaining sensitive to biological and subsistence values and, (2) to consider changing the current prescriptive stipulations into a mixture of prescriptive and performance-based stipulations similar to those being developed for the Northwest portion of the National Petroleum Reserve."

2 The Pacific Flyway Council is an organization of the fish and wildlife agencies of the 11 western states, British Columbia, Alberta, and cooperators in Mexico. The Council facilitates the scientific management of migratory birds and their habitats, in association with federal agencies and other cooperators, to sustain and enhance the public's resource interest in the U.S., Canada, and Mexico.

3 The Council has a strong interest in the habitats of NPR-A that support abundant and valuable migratory bird resources, particularly those in the Teshekpuk Lake Special Area (TLSA) that constitute a secure, traditional molting site for 50-90,000 geese. There are several key reasons why this area is of exceptional importance to waterfowl, other wildlife, and broad public values of those resources:

- 4** • Ecologically, this region contains extensive wetland and tundra habitats that have a regionally distinctive origin, unique characteristics that attract breeding and molting waterfowl, and are sensitive to perturbations.

- During summer, TLSA is the largest and most significant molting area for Pacific black brant, supporting up to 30% of the entire population from breeding grounds in Canada, Russia, and mostly (up to 70%) the Yukon-Kuskokwim Delta. In addition, some Western High Arctic brant from Canada now use TLSA during the molt; WHA brant, at less than 10,000 birds, are perhaps the smallest goose population in North America. The Council is particularly concerned about impacts that could accelerate declines in black brant (currently within 4,000 birds of a threshold established to restrict all hunting rangewide) or increase risks to the small population of WHA brant.

006
Birds

- TLSA is the major molting ground for Midcontinent white-fronted geese that breed on the North Slope. Recent surveys indicate a significant increase in molting by these birds in TLSA—up to 35,000 and averaging over 23,000 for the past five years.

007
Birds

- Waterbirds that depend on NPR-A habitats, particularly waterfowl, are of high value to a wide range of constituents from Russia, Arctic Canada, Alaska, Pacific coast states, and Mexico. White-fronted geese, pintails, and tundra swans are important resources that move through the Central and Mississippi Flyways as far as Mexico. These migratory birds are highly valued for subsistence and recreational hunting, viewing, and education across most of North America.

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The Council has had a sustained interest in land use planning and potential effects on wildlife in NPR-A, providing comments during early development of an oil and gas leasing program in the 1980s, and again for the 1998 EIS for the Northeast Planning Area. Over the long term, despite **several major planning processes and continuous dialogue on resource management**, the Council's level of concern for waterfowl and wetlands in TLSA has increased, based on several milestones:

009
Special
Designation

- In the 1980s, your agency established special areas within NPR-A, including the TLSA, to recognize high values to wildlife, yet none of these areas has been given enduring and substantial protection.

10
LSA
→ boundaries

- There has been a steady erosion of boundaries of the TLSA, as management programs have evolved, reducing the amount of waterfowl habitat and molting lakes that are given special recognition.

011
Special
Designation

- Through the 1998 EIS and record of decision, part of the TLSA was deferred from oil and gas leasing, but evaluation of the potential impacts of oil production in this areas was deficient in the EIS, eventual lease sales encroached further into TLSA, and there is still no firm commitment to long-term protection of core goose habitats.

12
SA
→ cumulative effects (CE)

- The announced intention of the current process to amend the Northeast Plan makes it clear that a primary focus will be leasing in TLSA—the only area of substantial petroleum interest that is not available. In addition, we are concerned about the outcome of revising protective stipulations and the parallel significant expansion of the Alpine satellite project into eastern NPR-A. Collectively, these processes have the potential for cumulative, long-term effects on wildlife that are far beyond the model of a few isolated “Alpine-type” scenarios presented in the 1998 EIS.

013
Birds

- Throughout most of the planning processes over 20 years, analyses of potential impacts of oil and gas activity on molting geese have not been rigorous and have not recognized the results of a substantial body of relevant research on disturbance and energetics. We recommend a more thorough and objective analysis of this critical subject.

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Given the unique ecological features of the Teshekpuk Lake area, the abundance and special character of waterfowl resources, and the national and international public interests in the resources of the NPR-A, the Council reiterates specific recommendations provided in 1998:

015
Birds

Birds

1. The draft amended IAP/EIS should specifically recognize the broad interests of stakeholders from other states, Arctic Canada, Russia, and Mexico in the migratory bird resources of the Northeast Planning Area, and assess the potential impacts of leasing and development on those interests.

16

Birds

2. The sensitive goose molting area should not be offered for leasing; it should not be open to construction of roads, pipelines, or other facilities; and seasonal human activity should be restricted, as necessary, to preserve the security of molting geese from disturbance and stress.

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m
mgmt

3. The Pacific Flyway Council also recommends that the Teshekpuk Lake Special Area be given permanent protection from future development by Secretarial designation.

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The Council appreciates the opportunity to provide advice during development of the draft amended IAP/EIS for the Northeast Planning Area, and we offer continuing expertise and input. **The Council will maintain a strong interest in your process and choice of preferred actions.**

Sincerely,



Miles Moretti
Chairman, Pacific Flyway Council

cc: Gale Norton, Secretary of the Interior
Rowan Gould, USFWS Regional Director, Anchorage
Steve Wendt, Chief of Migratory Bird Conservation, Canadian Wildlife Service
Kevin Duffy, Commissioner, Alaska Department of Fish and Game
Vernon Bevill, Chairman, Central Flyway Council
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